

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FUND LIQUIDATION HOLDINGS LLC, as
assignee and successor-in-interest to FrontPoint
Asian Event Driven Fund L.P., on behalf of itself
and all others similarly situated,

Plaintiff,

v.

Docket No. 16-cv-05263 (AKH)

CITIBANK, N.A., BANK OF AMERICA, N.A.,
JPMORGAN CHASE BANK, N.A., THE ROYAL
BANK OF SCOTLAND PLC, UBS AG, BNP
PARIBAS, S.A., OVERSEA-CHINESE BANKING
CORPORATION LTD., DEUTSCHE BANK AG,
CREDIT AGRICOLE CORPORATE AND
INVESTMENT BANK, CREDIT SUISSE AG,
STANDARD CHARTERED BANK, DBS BANK
LTD., UNITED OVERSEAS BANK LIMITED,
AUSTRALIA AND NEW ZEALAND BANKING
GROUP, LTD., THE BANK OF TOKYO-
MITSUBISHI UFJ, LTD., THE HONGKONG AND
SHANGHAI BANKING CORPORATION
LIMITED, AND JOHN DOES NOS. 1-50,

Defendants.

DECLARATION OF MATTHEW J. PORPORA

MATTHEW J. PORPORA declares as follows:

1. I am a partner of Sullivan & Cromwell LLP (“Sullivan & Cromwell”) located in

New York, New York.

2. Defendants Barclays PLC, Barclays Bank PLC and Barclays Capital Inc.

(collectively, “Barclays”) are represented by the law firms of Sullivan & Cromwell and Boies Schiller Flexner LLP (“Boies Schiller Flexner”) in the above-referenced action (the “Action”).

3. The following attorneys from Sullivan & Cromwell have appeared in the Action as counsel for Barclays: David H. Braff, Yvonne S. Quinn, Jeffrey T. Scott and Matthew J. Porpora.

4. Upon the Court's granting of the accompanying motion for withdrawal of appearance, Sullivan & Cromwell, including each of the above-listed attorneys, will cease representing Barclays in the Action.

5. Boies Schiller Flexner will continue to represent Barclays in the Action, and the withdrawal of the above-listed Sullivan & Cromwell attorneys will not prejudice Barclays.

6. Pursuant to the Court's October 4, 2018 order (Dkt. No. 302), Barclays has been dismissed from the Action. On December 26, 2018, however, plaintiff filed a motion for leave to file a fourth amended complaint (Dkt. No. 347), which purports to name Barclays as a defendant. Briefing on this motion concluded on February 8, 2019, with plaintiff's filing of a reply memorandum in support of its motion (Dkt. No. 364). Oral argument is scheduled for March 19, 2019. (Dkt. No. 362).

7. Neither Sullivan & Cromwell nor any of its attorneys is asserting a retaining or charging lien.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 13, 2019
New York, New York

/s/ Matthew J. Porpora
Matthew J. Porpora